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Attorney for Defendant JENNINGS

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

\* \* \*

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANDRE MARQUISE JENNINGS

Defendants.

CASE NO.: 2:20-cr-00096-RFB-VCF

**STIPULATION TO ALLOW TRAVEL  
OUTSIDE OF THE DISTRICT OF  
NEVADA.**

IT IS HEREBY STIPULATED AND AGREED, by and between CHRISTOPHER CHIOU, ESQ., Acting United States Attorney, and KIMBERLY ANNE SOKOLICH, ESQ., Assistant United States Attorney, counsel for the United States of America and ERICK M. FERRAN, ESQ., Counsel for Defendant ANDRE MARQUISE JENNINGS, that the Defendant be allowed to travel outside of the District of Nevada from May 28, 2021, until

This stipulation is entered into for the following reasons:

1. Defendant requests permission to travel to visit an ailing grandparent in the State of California.
2. Defense Counsel has consulted with Assistant United States attorney, who has no objection.
3. Defendant Jennings is not in custody, and has remained compliant with the terms of Pretrial Services.
4. Pretrial Services, specifically, Officer Simone, has no objection to the court allowing Defendant Jennings to travel outside of the District of Nevada.

- 1 5. Defendant's counsel has no reason to believe that Defendant poses a flight risk, or that  
2 Defendant will not remain compliant with the terms of Pretrial Services.  
3 6. Defendant's counsel maintains that he has excellent contact and a working e-mail and  
4 phone number for Mr. Jennings and that he is responsive to all communications.  
5 7. Defendant's counsel and Defendant represent that the request is made so that Mr. Jennings  
6 can visit an ailing grandparent in California. It will also be for the purpose of pleasure.  
7 8. Mr. Jennings would be departing on May 28, 2021, and returning on June 1, 2021.  
8 9. Mr. Jennings, while in California, will be staying with his mother, Tamara, at the  
9 following address: 2776 Colby Street, Hemet, California 92545.  
10 10. Mr. Jennings would naturally comply with any further restrictions required by Pretrial  
11 Services during the time of his travel.  
12 11. For all the above-stated reasons, this Honorable Court should allow Defendant Jennings  
13 to travel outside of the District.  
14 12. All parties involved are in agreement to allow the limited travel request.

15 DATED this 28<sup>th</sup> day of May, 2021.

16  
17 /s/ Erick M. Ferran, Esq.  
18 ERICK M. FERRAN, ESQ.  
19 Counsel for Defendant Jennings

/s/ Kimberly Sokolich, Esq.  
KIMBERLY SOKOLICH, ESQ.  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 \* \* \*

4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 vs.

7 ANDRE MARQUISE JENNINGS,

8 Defendant.

CASE NO.: 2:20-cr-00096-RFB-VCF

**ORDER TO ALLOW TRAVEL  
OUTSIDE OF THE DISTRICT OF  
NEVADA.**

9 **FINDINGS OF FACT**

10 Based on the pending Stipulations of the parties, and good cause appearing therefore, the  
11 Court finds that:

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1. Defendant requests permission to travel to visit an ailing grandparent in the State of California.
  2. Defense Counsel has consulted with Assistant United States attorney, who has no objection.
  3. Defendant Jennings is not in custody, and has remained compliant with the terms of Pretrial Services.
  4. Pretrial Services, specifically, Officer Simone, has no objection to the court allowing Defendant Jennings to travel outside of the District of Nevada.
  5. Defendant's counsel has no reason to believe that Defendant poses a flight risk, or that Defendant will not remain compliant with the terms of Pretrial Services.
  6. Defendant's counsel maintains that he has excellent contact and a working e-mail and phone number for Mr. Jennings and that he is responsive to all communications.

1 7. Defendant's counsel and Defendant represent that the request is made so that Mr.  
2 Jennings can visit an ailing grandparent in California. It will also be for the purpose  
3 of pleasure.

4 8. Mr. Jennings would be departing on May 28, 2021, and returning on June 1, 2021.

5 9. Mr. Jennings, while in California, will be staying with his mother, Tamara, at the  
6 following address: 2776 Colby Street, Hemet, California 92545.

7 10. Mr. Jennings would be required to comply with any further restrictions required by  
8 Pretrial Services during the time of his travel.

9 11. For all the above-stated reasons, this Honorable Court should allow Defendant  
10 Jennings to travel outside of the District.

11 12. All parties involved are in agreement to allow the limited travel request.

12 **ORDER**

13 IT IS ORDERED that Defendant be allowed to travel outside of the District of Nevada.

14 IT IS FURTHER ORDERED that Defendant be permitted to leave the District of Nevada  
15 on May 28, 2021.

16 IT IS FURTHER ORDERED that Defendant return to the District of Nevada, no later than  
17 June 1, 2021, at 11:59 p.m, and that any and all additional conditions imposed by the Court or by  
18 Pretrial Services be strictly complied with by Defendant.

19 **DATED** this 28th day of May, 2021.

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23 RICHARD F. BOULWARE, II  
24 UNITED STATES DISTRICT JUDGE  
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